

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In Re:)	
)	
RAY A BOHANAN)	Case No. 13-15540-JDL
TERESA A BOHANAN)	
Debtors.)	Chapter 13

**AMENDED
MOTION TO RETAIN TAX REFUND,
WITH BRIEF IN SUPPORT
AND NOTICE OF OPPORTUNITY FOR HEARING**

COMES NOW Debtors Ray and Teresa Bohanan, and Moves the Court for an order allowing Debtors to retain their 2014 state and federal tax refunds and in support thereof states as follows:

1. On December 23, 2013, the Debtors filed a Petition under Chapter 13 of the Bankruptcy Code and on June 11, 2014 this Court entered its Order Confirming Plan.
2. Debtors will receive a federal refund in the amount of \$2,085.00 and a state refund in the amount of \$308.00.
3. After confirmation, Debtor Teresa Bohanan quit her job because of health reasons. Teresa Bohanan received her last paystubs on October 31st, 2014 and retained new employment in January, 2015 for less pay than her previous employment.
4. In addition to this temporary loss and permanent reduction in income, Joint Debtor was involved in an automobile accident on or around February 24, 2015 where Debtors 1999 Honda Passport vehicle was totaled. Thereafter, the Debtors auto insurance has agreed to issue Debtors a payment of \$2,677.85 to go toward the purchase of a replacement vehicle.
5. Debtors have negotiated with a private party seller of a 1996 Chevrolet 1600 Extended Cab to be purchased for \$3,800.00 and are in need of and additional \$1,122.15 to purchase the replacement vehicle.
6. Joint Debtor is further undergoing medical treatment for injuries sustained in the vehicular accident and may need additional funds in the event insurance fails to pay for all of her care.

WHEREFORE, for the reasons stated above, Debtor respectfully requests that this Court enter an order allowing him to retain his federal and state income tax refunds for 2014.

Respectfully submitted,

/s Tearsa Storms Olson

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NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than twenty-one (21) days from the date of filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The 21 day period includes the three (3) days allowed for mailing provided in Bankruptcy Rule 9006(f).